

Lovells LLP
 590 Madison Avenue
 New York NY 10022
 Tel: +1 212 909 0600
 Fax: +1 212 909 0660

Lovells

September 27, 2007

BY HAND

Hon. Peter K. Leisure
 United States District Court,
 Southern District of New York
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street, Room 1910
 New York, NY 10007-1312

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/1/07

RE: Media Development Equity Fund ("MDEF") v. Novi List d.d., ("Novi List"), No. 07 Civ. 3624 (PKL) (S.D.N.Y.)

Dear Judge Leisure,

We represent Defendant Novi List in the above-referenced matter. We write concerning the upcoming deadline of Defendant's response to MDEF's motion for partial summary judgment.

Regrettably, due to the recent illness of Mr. Zdenko Mance, Novi List's CEO and our key witness and affiant, we have been unable to meet with him for the purpose of securing an affidavit in support of our opposition papers. Mr. Mance's testimony is instrumental to our defense.

We have attached for the Court's review a certified translation of Mr. Mance's diagnosis that has been provided to us by his physician. Given Mr. Mance's medical condition, we contacted opposing counsel yesterday to request an extension of time for our response papers, but Plaintiff denied our request this morning. Plaintiff did not provide a reason for its denial.

Mr. Mance, who resides in Croatia, was originally scheduled to travel to New York earlier this month; however, he was hospitalized in Croatia in mid-September, and his ill health mandated a change in plans. His recent hospitalization also prevented us from meeting him in Croatia. Mr. Mance was discharged from the hospital for home convalescence only this past Monday and has been under doctors' orders to rest. We had planned to visit Mr. Mance this week, but have been asked to refrain from doing so to allow him some time to rest as directed by his physician. The very earliest we would be in a position to meet with Mr. Mance would be at the beginning of next week, and even that would be a hardship to Mr. Mance.

Accordingly, we hereby respectfully request that Your Honor grant a brief extension of the due date of Defendant's response for at least one week, from the original due date of October 4, 2007 to October 11, 2007, or for whatever period of time Your Honor deems appropriate under the circumstances.

Other than the extension of time agreed to by the Parties to facilitate settlement discussions, which Your Honor granted, there have been no other requests for extensions in this matter. The only other scheduled date that would be affected by the requested extension is the deadline for MDEF to

Returned

Numbers for scanning on 10.9.07

Scanned

Numbers on 10/11/07

MICROFILM

OCT - 2 2007 9:45 AM

Hon. Peter K. Leisure

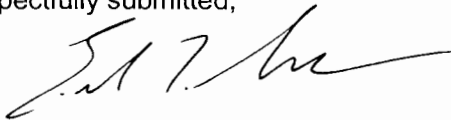
-2-

September 27, 2007

serve its reply papers in support of the pending motion. Novi List would agree to the adjournment of MDEF's reply papers for a period of time equal to that of any time that may be granted to Novi List.

Thank you for your attention.

Respectfully submitted,

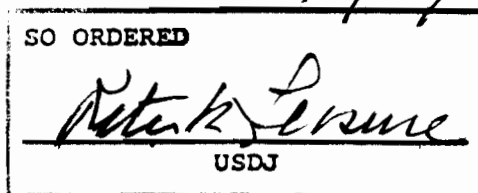


Edward T. Schorr

Enclosure

cc: James E. Hough, Esq.

Defendant's request for an extension
of time is granted. Defendant's
response is due October 11, 2007.
Plaintiff also is granted a one-week
extension of time to reply.



CERTIFIED TRANSLATION FROM CROATIAN LANGUAGE

CLINICAL HOSPITAL RIJEKA
HEALTH CARE CENTRE
EMERGENCY MEDICAL AID
RECEPTION

Reg. No. 12227
Health Insur. Reg No. 07202781162
Code:
Citizen's Registration Number
Issued by 072

Stamp: Clinical Hospital Rijeka
Emergency Institute
Department Rijeka,
Krešimirova 42

EMERGENCY

Name and surname ZDENKO MANCE born: 1951 Profession: A 101
Family member of the insured: born on employed by
In
Place of residence RKA Street KRIMEJA No. 13
Competent Communal Institute for Health Insurance

Date of acceptance:

27 September 200

MEDICAL HISTORY, STATUS, FINDINGS - DIAGNOSIS
RECOMMENDATION FOR FURTHER TREATMENT
AND CONTROL

Beginning of examination at:

9:50

End of examination at:

10:50

Medical intervention
DIAGNOSTIC
THERAPY

The patient is under constant surveillance of the neurologist after hospitalisation in our clinic due to primary brain bleeding (medical documents attached). In the last days deterioration. Expressed general weakness and exhaustion, dizziness, and expressed headache. Hightened blood pressure in spite of receiving therapy. Tense.

RR mmHg

Puls /min

Tax °C

Trect °C

EKG Monitor

Laboratory

RTG

In the neurological status right-side central hemiparesis, now with extremely strong spasm of musculature.

Medicine:

AnaTe 0,5 ml

Oxygen 1/min

Infusion

Dg. Status post hamethoman intracerebrale
Status lacunaris cerebri
Hemiparesis centralis lateris dextri
Crisis hypertensiva
Hypertonia arterialis
Cardiomyopathia hypertensiva

Th. Past
+ Prexanil 4 mg
Helex 2 x 0,5 mg

Strict resting required. Avoidance of any psychophysical effort (oral instructions given to the patient). Three times daily RR control. Control by the neurologist in ten days, in case of any deterioration (headache, nausea, vomiting, sleepiness) control immediately here.

(signature illegible)

Antončić

Mr Sc Dr Igor Antončić

Neurologist

001236

No. 111/07

I, Katica Vujević-Jolić sworn court interpreter for English and German language, reappointed by the decision No. 4Su-297/07 of 8 March 2007 of the President of the County Court of the City of Zagreb, hereby certify that the above translation fully complies with the Croatian original.

27.09.2007

27/09 2007 10:19 FAX -385 51 432462

HP PU RIJEKA10 RH

001

KLINIČKI BOLNIČKI CENTAR — RIJEKA
POLIKLINIKA — HITNA MEDICINSKA POMOĆ
PRIJEMNO — TRIJAŽNA — AMBULANTA

A	B	C	D	E	F	G	H	I	J
OSNOVA OSIGURANJA									

Klinički bolnički centar Rijeka
Zavod za hitnu medicinu
Odjel Rijeka, Kneževa 42

HITAN SLUČAJ

Mat. broj 12222

Reg. br. zdr. knj. 272 272 272

Šifra

JMBG

izdana od

I.

Ime i prezime ZDRENKO RANCO

God. rod. 1951

Zanimanje

Član porodice osiguranika

Rođenog god

Zaposlen kod

u mjestu

Mjesto stalnog boravka

Ulica

Nadležni komunalni zavod za socijalno osiguranje

Datum prijema: 27.9.2007		ANAMNEZA, STATUS, NALAZ, MIŠLJENJE - DIJAGNOZA PREPORUKA O DALJNJEM LIJEČENJU I KONTROLI		Medicinski zahvat DIJAGNOSTIČKI TERAPIJSKI	
Početak obrade u: 08.00		Završetak obrade u: 10.00			
<p>Bolesnik je pod stalnom kontrolom neurologa nakon hospitalizacije u našoj klinici zbog primarnog moždanog krvarenja (medicinska dokumentacija u prilogu). Posljednjih dana pogoršanje. Izražena opća slabost i malaksalost, vrtoglavice, te izražena glavobolja. Povišen krvni tlak usprkos redovitoj uzimanju terapije. Napet.</p> <p>U neurološkog statusu desnostrana centralna hemipareza, sada s izraženim jakim spazmom muskulature.</p> <p>Dg. Status post haematomat intracerebrale Status lacunaris cerebri Hemiparesis centralis lateris dextri Crisis hypentensive Hypertonía arterialis Cardiomyopathia hypertensiva</p> <p>Th. Dosadašnja - Prexanil 4 mg Delex 2 x 0,5 mg</p> <p>Potrebno strogo mirovanje. Izbjegavati svaki psihofizički napor (usmene upute dane bolesniku). Tri puta dnevno kontrola RR-a. Kontrola neurologa za deset dana, u slučaju bilo kakvog pogoršanja (glavobolja, mučnina, povraćanje, pospanost), kontrole odmah ovdje.</p> <p style="text-align: center;">Antonić Mr. dr. Igor Antončić neurolog 001298</p>				RR nimHg	
				Puls /min	
				Tax °C	
				Trect °C	
				EKG <input type="checkbox"/> Monitor <input type="checkbox"/>	
				Laboratorij <input type="checkbox"/>	
				RTG <input type="checkbox"/>	
				Lijekovi:	
				AnaTe 0,5 ml. <input type="checkbox"/>	
				Kisik 1/min	
Intuzije:					

JAVITI SE ODMAH NADLEŽNOM LIJEČNIKU